

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LARRY ENRIQUEZ, Individually and On
Behalf of All Others Similarly Situated,)
Plaintiff,)
v.)
NABRIVA THERAPEUTICS PLC, TED)
SCHROEDER, GARY SENDER, and)
JENNIFER SCHRANZ,)
Defendants.)

Case No. 1:19-cv-04183-VM
CLASS ACTION

**PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND AN APPLICATION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES AND A REIMBURSEMENT
AWARD FOR PLAINTIFF**

Lead Plaintiff Jonathan Schaeffer (“Plaintiff”), on behalf of himself and all others similarly situated, hereby moves this Court, before the Honorable Victor Marrero, United States District Judge, at the United States District Court for the Southern District of New York, Courtroom 15B, 500 Pearl Street, New York, NY 10007-1312, on May 14, 2021 at 10:30 a.m., or such other location and time as set by the Court, for an Order (i) certifying the Class; (ii) finally approving the Settlement and Plan of Allocation; (iii) awarding attorneys’ fees to Co-Lead Counsel in the amount of 33 1/3% of the Settlement Amount, plus interest; (iv) granting reimbursement of \$95,393.68 in litigation expenses; and (v) awarding reimbursement to Plaintiff in the amount of \$5,000.

The form of the proposed Order and Judgment Granting Final Approval of Class Action Settlement (“proposed Final Order”) was attached as Exhibit 1-B to Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 71-3), and an updated proposed Final Order will be submitted with Co-Lead Counsel’s Reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Class have passed.

Defendants do not oppose final approval of the Settlement, and take no position on Co-Lead Counsel’s Application for Attorneys’ Fees, Reimbursement of Litigation Expenses and a Reimbursement Award to Plaintiff.

Dated: April 14, 2021

Pomerantz LLP

By: /s/ Omar Jafri

Patrick V. Dahlstrom
Omar Jafri
Ten South La Salle Street, Suite 3505
Chicago, Illinois 60603

Telephone: (312) 377-1181
E-mail: pdahlstrom@pomlaw.com
ojafri@pomlaw.com

-and-

Jeremy A. Lieberman
J. Alexander Hood II
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
E-mail: jalieberman@pomlaw.com
ahood@pomlaw.com

Holzer & Holzer LLC

Marshall P. Dees
210 Ashwood Center Parkway, Suite 1010
Atlanta, GA 30388
Telephone: (770) 392-0090
Email: mdees@holzerlaw.com

*Co-Lead Counsel for Lead Plaintiff
and the Class*